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July 12, 2018 4:14 PM

U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

Keturah Mixon,

Plaintiff in Pro Per,

Case No. 1:18-cv-499

Honorable Paul L. Maloney

Vs.

Trott Law P.C. (f/k/a Trott and Trott P.C.)
Carrington Mortgage Services LLC,
(a/k/a Carrington Mortgage Holdings LLC),
Bank of America Corporation,
(a/k/a Bank of America N.A.)

Defendants

Keturah Mixon
243 Devon Road
Battle Creek Mi. 49015
(269) 339-9337
Plaintiff in Pro Per

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**PLAINTIFF IN PRO PER KETURAH MIXON'S MOTION FOR
JUDGMENT ON THE PLEADINGS AGAINST DEFENDANTS TROTT
LAW P.C., AND CARRINGTON MORTGAGE SERVICES LLC,
PURSUANT TO THE FEDERAL RULES OF CIVIL PROCEDURE 12(C)
AND RULE 8 AND MEMORANDUM OF LAW IN SUPPORT
*EXPEDITED CONSIDERATION AND ORAL ARGUMENT
REQUESTED***

Comes now Plaintiff, pursuant to Rules 12(C) and Rule 8 of the Federal Rules of Civil Procedure, and moves this Honorable Court for entry of Judgment on the Pleadings in her favor and against defendants Trott Law P.C., and Carrington Mortgage Services LLC., (The defendants) on all counts of her complaint except as to the amount of damages to be determined by the Jury at trial. In support of her motion Plaintiff submits her concurrently filed memorandum of law.

This motion is based on the following grounds:

1. On May 3rd 2018, Plaintiff filed a Verified Complaint ("complaint") alleging that the defendants have violated her rights under the Constitution and under several other Federal Laws and statutes.
2. On June 20th and June 21st, 2018 respectively, Defendants as to Trott Law P.C. and Carrington Mortgage Services LLC filed their answers and affirmative and special defenses to Plaintiff's Complaint.
3. Defendants as to Trott Law P.C. and Carrington Mortgage Services LLC have directly and/or by omission admitted to all of the material allegations in Plaintiff's Complaint.

4. Defendants Trott Law P.C. and Carrington Mortgage Services LLC did not state in short and plain terms its defenses to each claim asserted against it.
5. There are no genuine issues of material fact and Plaintiff is entitled to Judgment as matter of law.

WHEREFORE, due to the fact that the pleadings have disclosed that there are no material issues of fact to be resolved and Plaintiff is entitled to Judgment as a matter of law, Plaintiff Prays that this Honorable Court enter Judgment on the Pleadings in Plaintiff's favor and against Defendants Trott Law P.C. and Carrington Mortgages LLC on all counts of her complaint except as to the amount of damages which is to be determined by the jury at trial.

Dated: July 8th, 2018

Respectfully Submitted,



Keturah Nixon
Plaintiff in Pro Per
243 Devon Road Battle Creek MI. 49015
(269)339-9337
keturahmixon@yahoo.com

CERTIFICATE OF SERVICE AND CERTIFICATE OF CONFERENCE

Plaintiff hereby certifies that she mailed a true and complete copy of the foregoing document along with The Memorandum in Support of Motion for Judgment on The Pleadings with the certificate of service, in The U.S. Mail on July 8th, 2018 to Defendants Trott Law P.C. and Carrington Mortgage Services LLC's attorneys on record. Plaintiff certifies that she has conferred with these defendants' attorneys on record through email about the same.

Dated: July 8th, 2018

Respectfully submitted,



Keturah Mixon
Plaintiff in Pro Per
243 Devon Road Battle Creek MI, 49015
(269)339-9337
keturahmixon@yahoo.com

Keturah Mixon
243 Devon Road
Battle Creek MI. 49015



United States District Court
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410 W. Michigan Avenue
Kalamazoo MI 49007
Attention: File Clerk